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*Attorneys for Defendant  
Atlantic Oceanic LLC*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

FLEETZERO INC.,

Plaintiff,

v.

ATLANTIC OCEANIC LLC,

Defendant.

**Case No. 25-cv-3240**

IN ADMIRALTY

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the Declaration of Michael J. Frevola, sworn to on May 13, 2025 and all exhibits thereto, and the accompanying Memorandum of Law, and upon the pleadings previously filed in this proceeding, Defendant Atlantic Oceanic LLC (“Defendant” or “Atlantic”), by and through its undersigned counsel, moves this Court before the Honorable Jesse M. Furman, United States District Judge, United States District Court, Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New

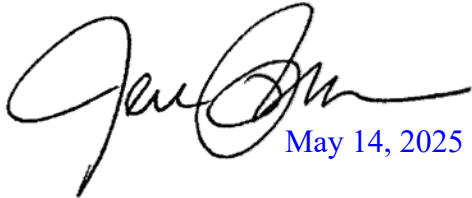
York, 10007, on a date and time to be designated by the Court, for a Protective Order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and granting such other and further relief as is deemed just and proper.

Dated: New York, New York

May 13, 2025

Pursuant to Local Rule 6.1(a), any opposition shall be filed by **May 20, 2025**, and Defendant's reply, if any, shall be filed by **May 22, 2025**.

SO ORDERED.



May 14, 2025

Respectfully Submitted,

HOLLAND & KNIGHT LLP

By: Michael J. Frevola

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